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**BY ECF**

The Honorable Jesse M. Furman  
U.S. District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Re: New York Wheel Owner LLC v. Mammoet-Starneth, LLC, et al.  
No. 17-cv-04026 (JMF)

Dear Judge Furman:

This firm represents Defendants Mammoet USA North Inc., Mammoet USA Holdings, Inc. (n/k/a Mammoet Americas Holding, Inc.), Starneth LLC, Mammoet Holding B.V. and Starneth B.V. (the "non-Debtors") in the above action. On December 22, 2017, the Court stayed this action for a period of 60 days (until February 20, 2018) in light of the bankruptcy case filed by Mammoet-Starneth LLC and directed the parties to report one week prior to the expiration of the stay as to whether the stay should be extended. On behalf of all parties, we submit this joint letter to request an extension of the current stay of this action for an additional 30 days (*i.e.*, until March 22, 2018) because the parties have agreed to attend a two-day mediation before United States Bankruptcy Judge Christopher S. Sontchi on February 28, 2018 and March 1, 2018. If the Court is amenable to this request, we suggest providing a similar joint report one week before the expiration of the extended stay deadline.

Respectfully submitted,

/s/ Jonathan S. Jemison

Jonathan S. Jemison

cc: All Counsel of Record (via ECF)